UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,
 	
    Plaintiff,
 	
v.
 	
GOOGLE LLC,
 	
    Defendant.
	Civil Action No. 1:19-cv-12551-FDS
	
	Hon. F. Dennis Saylor IV

DECLARATION OF KEVIN GANNON IN SUPPORT OF
PLAINTIFF'S EMERGENCY MOTION TO
REOPEN DISCOVERY REGARDING DEFENDANT'S
PRODUCTION OF RELEVANT EMAIL EVIDENCE ON JULY 12, 2023

I, Kevin Gannon, hereby declare as follows:

1.   I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC ("Singular"), in this action. I submit this declaration in support of Singular's Emergency Motion to Reopen Discovery Regarding Defendant's Production of Relevant Email Evidence on July 12, 2023.

2.   Attached hereto as Exhibit A is a true and correct copy of Google's document production cover letter dated July 12, 2023.

3.   Attached hereto as Exhibit B is a true and correct copy of a document produced by Google bearing bates reference GOOG-SING-00242320-00242325.

4.   Attached hereto as Exhibit C is a true and correct copy of excerpts from the deposition of Jeffrey Dean taken July 21, 2021.

5.   Attached hereto as Exhibit D is a true and correct copy of a document produced by Singular bearing bates reference Singular-00004970-00004984.

1

6.   Attached hereto as Exhibit E is a true and correct copy of Plaintiff's First Request for Email Productions dated October 20, 2020.

7.   Attached hereto as Exhibit F is a true and correct copy of a document produced by Google bearing bates reference GOOG-SING-00242326-00242337.

8.   Attached hereto as Exhibit G is a true and correct copy of a document produced by Google bearing bates reference GOOG-SING-00242338-00242343.

9.   Attached hereto as Exhibit H is a true and correct copy of a document produced by Google bearing bates reference GOOG-SING-00113108-00113110.

10.   Attached hereto as Exhibit I is a true and correct copy of an email from Kevin Gannon to Deeva Shah dated July 14, 2023.

Executed at Boston, Massachusetts on July 17, 2023.

                                        /s/ Kevin Gannon

2